

Aileen A. Pisciotta LLC

6302 Crosswoods Circle
Falls Church, VA 22044

Tel: 703-914-2635

Fax: 703-914-1058

June 28, 2007

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Ex Parte* Notice: CG Docket No. 03-123

Dear Ms. Dortch:

On June 27, 2007, the undersigned, representing the Speech-to-Speech user community, met with John Hunter, Legal Assistant to Commissioner McDowell. Bob Segalman, President of Speech Communication Assistance by Telephone, Inc. (SCT) also participated in the meeting via telephone.

During the meetings, we explained how the Speech-to-Speech (STS) relay service works. We noted that it currently serves only a small fraction of the thousands of speech-impaired individuals who are otherwise unable to utilize the telephone. We also discussed the need to ensure adequate funding for this new but important service. We specifically noted that the current TRS Fund rate for STS is approximately \$1.40/minute while the projected costs are approximately \$3.40/minute. This substantial deficit creates a disincentive that would stunt the growth of this service at the very time that it needs more marketing and outreach. We recommended that the STS rate be set no lower than its costs to create incentives for providers to offer and promote the service. We also stated that, to the extent that the so-called "MARS" plan would result in a rate lower than the projected costs, we would oppose the reliance on such a plan to set rates for STS.

Finally, we urged the FCC to consider reinstating an STS position on the FCC's Consumer Advisory Committee. The advocacy needs of the speech-impaired are unique and not necessarily adequately represented by advocates for other disabled groups. The attached presentation summarizes many of the key points discussed during the meetings.

Sincerely,



Aileen A. Pisciotta, Esq.
Licensed in the District of Columbia (Bar #3754345)

Attachment

cc: Legal Assistants Hunter, Dillner, Bergmann, Freedman and Deutchman
Consumer & Government Affairs Bureau

Speech-to-Speech (STS)

Presentation by Speech Communications Assistance by Telephone, Inc.

Re: **CC Docket No. 03-123**

June 27, 2007

STS User Community:

- STS serves individuals who are speech impaired due to such causes as accidental brain injury, larynx removal due to cancer, Cerebral Palsy, Multiple Sclerosis, Muscular Dystrophy, Stuttering, Spasmodic Dysphonia, ALS, or Parkinson's Disease.
- Without special assistance, this community cannot utilize the telephone.
- STS is new and utilization is still low
 - ***About 25% of the 2.5 million speech disabled Americans¹ can use STS successfully (total of 250,000-500,000 Americans).***
 - Only a few thousand people appear to be aware of and to use STS now.

STS Service:

- No specialized equipment required.
- User dials an access number (e.g., 711) to reach a specially trained communications assistant (CA) and provides the CA with the number being called.
- CA then dials the number and (if necessary) explains STS to the called party.
- Caller talks into the telephone and CA re-voices the words *verbatim* so that the called party can hear.
- When the called party talks, the caller simply listens, with no help from CA.

Position on CC Docket No. 03-123: Proposed Rate Cuts Would be Disastrous

- STS is a nascent service reaching only a fraction of the potential user community.
- Marketing and outreach are crucial to increasing awareness and use of STS by both speech disabled and general public.
- Cuts in the rate for STS as proposed by **NECA** and the **Hamilton MARS plan** would stunt the development of the service and harm the speech-disabled community.
- Small volume relay service such as STS should not be the focus for rate cutting.

Request to the FCC:

- Set the rate for STS based on providers' projected costs.
- Ensure the STS rate is high enough to encourage providers to offer the service and educate the public about its availability.
- Consider expanding FCC Consumer Advisory Committee to include an STS representative.

Speech Communication Assistance By Telephone, Inc. (SCT) is a non-profit (501(c)(3)) organization dedicated to helping the speech-disabled gain access to the social and economic benefits of telephonic communications using Speech-to-Speech. SCT has filed ex parte comments by letter in CC Docket No. 03-123.

Bob Segalman, Ph.D., D.Sc. (Hon), President
Speech Communication Assistance By Telephone, Inc.
Founder, Speech-to-Speech
515 P St, #403; Sacramento, CA 95814
Phone: 711 + request STS and 916-448-5517
E-mail: drsts@comcast.net

Rebecca Ladew
East Coast Liaison for SCT
Speech Disabled Representative on The
National Telecommunications Relay Service
Advisory Council
Email: rebecca.ladew@verizon.net

¹ From "Americans with Disabilities 1991-92," Bureau of the Census Report, U.S. Department of Commerce Economics and Statistics Administration, 1993."